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September 29, 2011

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

**MAYOR**  
Jim Frazier

**VICE MAYOR**  
Kevin Romick

**COUNCILMEMBERS**  
Pat Anderson  
Randy Pope  
Carol Rios

In the Matter of )  
)  
Acceleration of Broadband Deployment )  
Expanding the Reach and Reducing the Cost of )  
Broadband Deployment by Improving Policies )  
Regarding Public Rights of Way and Wireless )  
Facilities Siting )

REPLY COMMENT OF CITY OF OAKLEY, CALIFORNIA  
REGARDING A COMMENT OF THE PCIA DOCKET

NO. 11-59 EXHIBIT B

The City of Oakley, California files this reply comment in response to the Notice of Inquiry ("NOP"), released April 7, 2011, to address a comment submitted by PCIA regarding the FCC's WC Docket No. 11-59. Specifically, within Section V of Exhibit B of FCC WC Docket No. 11-59 (enclosed), the PCIA comments that the City of Oakley is a jurisdiction that retains "consultants identified by the wireless infrastructure industry as obstructionists and problematic". This PCIA comment is erroneous. The City of Oakley has not, nor currently retains, outside consultants to process applications for wireless communication facilities. All applications are processed by City staff in a timely manner.

We respectfully request that the Commission disregard the comment filed by the PCIA. Please contact me at (925) 625-7000 if you should have any questions.

Best regards,

Bryan H. Montgomery  
City Manager  
City of Oakley, California

Enclosure

Cc: Derek P. Cole, City Attorney

## EXHIBIT B

The following sections represent information collected by the PCIA and its members surrounding issues the industry faces as it attempts to improve and expand wireless service around the country. Be no means exhaustive, this information is intended to highlight for the Commission some examples of the challenges that face the wireless infrastructure industry every day.

### I. Legal, Nonconforming Towers Are Prohibited from Adding or Changing Antennas

Identified by one of our members as “the most problematic development in recent years,” some jurisdictions prohibit adding antennas to towers that are designated “legal, non-conforming” status under the zoning process. A legal, non-conforming use is a use or structure which was legally established according to the applicable zoning and building laws of the time, but which does not meet current zoning and building regulations. A use or structure can become legal, non-conforming due to rezoning, annexation, or revisions to the zoning code.

<u>Jurisdiction</u>	<u>State</u>	<u>Citation</u>	<u>Description</u>
Scottsdale	AZ	N/A	While the code provides for administrative review of collocations under many different circumstances, most structure built prior to the code's adoption in 2003 are now legal non-conforming. As such any modification requires the entire site to be brought into compliance with the code.
Albany	CA	N/A	Even "like-for-like" replacements of antennas on existing legal non-conforming towers are prohibited, effectively limiting 4G rollout.
Irvine	CA	Zoning Ordinance 3-8-2 et seq.	Original plans called for 110-foot monopole, but after negotiations with the city reduced to 82-foot monopole with four planned RAD centers. AT some point later, before the entire site was built out, the City designated the site legal/non-conforming, and further build-out has been disallowed.

Torrence	CA	Code of Ordinances, 92.39.040 (b)	The city originally required company to construct a "stealth" tower in a residential area, but then later said it no longer wants any towers in such areas and will not allow additional build out on the original tower.
San Bernardino	CA	N/A	Collocations on existing wireless facilities are "by right," but most existing structures are nonconforming and therefore require a CUP.
Jennings Co.	IN	N/A	New ordinance requires Institutional Zoning District for Telecommunications facilities. Until PCIA members rezone their facilities, they are considered legal, non-conforming and are unable to add new antennas, collocate or add any ground improvements.
Lafayette	IN	N/A	Wireless facilities in any district other than Agricultural or Industrial are nonconforming uses; collocations are considered an expansion of the use, which is prohibited under the code.
Tippecanoe Co.	IN	N/A	Wireless facilities in any district other than Agricultural or Industrial are nonconforming uses; collocations are considered an expansion of the use, which is prohibited under the code.

Leawood	KS	Leawood Development Ordinances § 16-4-2	Restrictive tower design, height, and antenna flush-mounting requirements for all existing wireless facilities; in order to add a new collocation, the entire site must be brought into compliance.
Olmstead Falls	OH	N/A	Site originally zoned by Olmstead Twp. sits on land since annexed by the City of Berea and is now considered a legal non-conforming use. As such, the site cannot be expanded.
Pearland	TX	Unified Development Code § 2.5.5.	Onerous setback and screening requirements imposed on tower owners seeking to install new collocations.
Mansfield	PA	Meredith Holford, <i>T-Mobile Withdraws Cell Tower Plan</i> , MANSFIELD NEWS (PA), Mar. 20, 2010.	Zoning variance was denied because, since the time that the permit was issued, the zoning rules had changed.

## II. Excessive Collocation Application Requirements Unnecessarily Delay Deployment

In many jurisdictions, the process to obtain a zoning permit to collocate antennas on a tower is as onerous as building a new tower. Often, this is because the community has an arrangement with a consultant who requires a significant escrow from the applicant for review of the application. The tower industry experience is that the application review will extend as long as the escrow has funding (and sometimes additional funds are required). The application process is usually extremely complex, requiring studies and engineering reports, not necessary for a straight collocation. The following are examples of jurisdictions where the collocation process was overly burdensome because of application requirements:

<u>Jurisdiction</u>	<u>State</u>	<u>Citation</u>	<u>Description</u>
Ardmore	AL	N/A	Consultant jurisdiction. Permitting process for collocation reported to be essentially the same as for new application, adding significantly to the cost.
Athens	AL	Zoning Ordinance § 78-44	City requires applicant to pay non-refundable fee of \$7,500, plus place \$2,500 in escrow to cover costs of expert consultation during the application process.
Decatur	AL	Zoning Ordinance § 7-314	Consultant jurisdiction. Nearly identical to Athens ordinance.
Gulf Shores	AL	Zoning Ordinance § 7-184	Consultant jurisdiction. Ordinance requires \$7,500 application fee for new permits, \$5,000 for collocations along with a \$2,500 escrow account.
Hartselle	AL	Zoning Ordinance § 88-36	Consultant jurisdiction. Ordinance requires \$8,500 application fee as well as \$2,500 in escrow.
Madison	AL	Zoning Ordinance § 17.5-17	Consultant jurisdiction. Ordinance requires \$8,500 application fee as well as \$2,500 in escrow.
Opelika	AL	Zoning Ordinance § 5.5-314	Consultant jurisdiction. Requires \$7,500 application fee and \$2,500 escrow.

Pelham	AL	Zoning Ordinance, Art. 2 § 5.5 <i>et seq.</i>	Consultant jurisdiction. Applications fees range from \$7,500 for new towers, to \$3,000 for collocation on existing towers to \$250 for simple site modifications.
Selma City	AL	Zoning Ordinance § 20 1/2-13	Consultant jurisdiction. Requires \$8,500 application fee and \$2,500 escrow.
Tuscumbia	AL	Zoning Ordinance § 6.5-74	Consultant jurisdiction. Requires \$7,500 application fee and \$2,500 escrow.
Aurora	IN	N/A	N/A
Dearborn	IN	Zoning Ordinance § 1530	Consultant jurisdiction. Requires \$8,500 for application fee and \$2,500 for escrow.
Lawrenceburg	IN	Zoning Ordinance § 154.41AN	Consultant jurisdiction. Requires \$8,500 for application fee and \$2,500 for escrow.
Eureka Springs	AZ	Becky Gillette, <i>City Council Enacts Six-Month Moratorium on Cell Towers</i> , LOVELYCITIZEN.COM (Apr. 14, 2010).	Six-month moratorium put in place, beginning April 2010.
Glendale	CA	Lara Cooper, <i>Supervisors Approve Stricter Cell-Tower Ordinance, But Say No to Moratorium</i> , NOOZHAWK, Dec. 1, 2009.	Moratorium put in place, 2009
Agoura Hills	CA	Lara Cooper, <i>Supervisors Approve Stricter Cell-Tower Ordinance, But Say No to Moratorium</i> , NOOZHAWK, Dec. 1, 2009.	Moratorium put in place, 2009
Spokane	WA	Pia Hansen, <i>Cell Tower Scramble</i> , INLANDER.COM.	Put in place a year long moratorium in 2001
Hamilton Twp.	PA	Adam McNaughton, <i>Hamilton Cell Tower Hearings Enter Second Year, No End In Sight</i> , POCONO RECORD, Apr. 13, 2010.	Approval hearing process lasted over one year, beginning in April 2009.

Topsham	ME	Darcie Moore, <i>Cell Tower Proposal Remains on Hold</i> , THE TIMES RECORD (ME), Mar. 18, 2010.	Approval process for 103-foot tower held up for almost a year.
Powel Co.	MT	Chelsi Moy, <i>Cell Tower Rejected at Trixi's Antler Saloon, No Service for Ovando</i> , THE MISSOULIAN, Mar. 13, 2010.	Siting process took over two years. Company faced repeated denials without explanation.
Glenwood	NJ	Jennifer Knoch, <i>Cell Tower Proposal Irks Neighbor</i> , STRAUS NEWS, Mar. 3, 2009.	Company had to get five separate variances in order to construct tower.
Lake Elmo	MN	James Warden, <i>Lake Elmo OKs New Rules for Cell Towers</i> , STILLWATER GAZETTE (MN), Nov. 5, 2009.	Consultant jurisdiction, had moratorium on new construction from Jan - Nov 2009
Vernon	NJ	Jennifer Knoch, <i>Cell Tower Won't Be Built</i> , STRAUS NEWS, Feb. 23, 2010.	After a year of back and forth with the jurisdiction, company withdrew its application
Aliso Viejo	CA	N/A	Moratorium in place since May, 2009
Richmond	CA	N/A	Moratorium in place since Feb. 2011
El Cerrito	CA	N/A	Moratorium in place for more than a year

In some jurisdictions, an applicant must prove the need for the addition antennas in order to be granted permission for new towers and/or attachments. Examples of these jurisdictions include:

<u>Jurisdiction</u>	<u>State</u>
Annapolis	MD
Harford Co.	MD
Newcastle	NY
Tewksbury Township	NJ
West Rockhill Township	PA
Lunenburg Co.	VA
Kohler	WI
Omro	WI

## II. Full Discretionary Zoning Hearings For Collocation:

Regardless of the status of the existing tower, collocation applications in certain jurisdictions must go through a full zoning review and hearing. One must obtain a variance or special use permit for each new collocation on a tower. Other jurisdictions where the industry has faced this issue include:

<u>Jurisdiction</u>	<u>State</u>
Flagstaff	AZ
Maricopa Co.	AZ
Mesa	AZ
Paradise Valley	AZ
Pima Co.	AZ
Scottsdale	AZ
Berkeley	CA
Burbank	CA
Carlsbad	CA
Chula Vista	CA
Davis	CA
Fontana	CA
Fresno	CA
Glendale	CA
Inglewood	CA
Irvine	CA
Lake Elsinore	CA
Long Beach	CA
Los Altos	CA
Los Angeles	CA
Moreno Valley	CA

Norwalk	CA
Oakland	CA
Oceanside	CA
Ontario	CA
Pacifica	CA
Pasadena	CA
Pomona	CA
Rialto	CA
Riverside County	CA
City of San Diego	CA
San Diego County	CA
San Dimas	CA
San Jose	CA
San Luis Obispo	CA
Simi Valley	CA
Temecula	CA
Thousand Oaks	CA
Torrance	CA
Ventura County	CA
Cobb Co.	GA
Huntley	IL



Cedar Lake	IL
Wilmette	IL
Highland Park	IL
Northbrook	IL
Hoffman Estates	IL
Winnetka	IL
Kenilworth	IL
Glenview	IL
Dearborn County	IN
Lawrenceberg	IN
Aurora	IN
Tippecanoe Co.	IN
Lafayette	IN
Allen County	IN
Ft. Wayne	IN
Lake County	IN
Concord	MA
Hopkinton	MA
Waltham	MA
Reno	NV
Epping	NH
Goffstown	NH
City of Albuquerque	NM
Monroe	OH
Silverton	OH

Strongsville	OH
Bend	OR
Portland	OR
Pine Township, Allegheny Co.	PA
Pawtucket	RI
Woonsocket	RI
Little Elm	TX
West Lake Hills	TX
Pharr	TX
Pearland	TX
Mission	TX
Alamo Heights	TX
Rollingwood	TX
South Lake	TX
Lucas	TX
League City	TX
Charlotte	VT
Leesburg	VA
Loudon Co.	VA
Vienna	VA
San Juan Co.	WA
Seattle	WA
Thurston Co.	WA
City of Issaquah	WA

### III. Rights of Way Issues:

Jurisdiction	State	Citation	Description
Portland	OR	City of Portland, Binding City Policy UTL-1.03 (Exhibit A)	City Council requires tower companies to meet with the affected neighborhood 30 days before applying to install on public right of way.
Irving	CA	City of Irvine Regulations § 2-37.5-5	City requires conditional use permit for collocation.
San Francisco	CA	San Francisco Administrative Code § 11.9	Requires multi-agency review of the application and facing Sec. 253 preemption challenge.
Temecula	CA	N/A	Imposes a CUP process on DAS
Scottsdale	AZ	N/A	City requires full backing of local residents for a project to proceed
Paradise Valley	AZ	Paradise Valley, Zoning Ordinance Art. XII § 1204(3)	Requires 200-foot setback from any single-family residence.
West Jordan	UT	N/A	Prior to allowing the replacement of streetlights to accommodate antennas, a zoning text amendment to the City ordinance is required.
Salt Lake City	UT	Salt Lake City, Zoning Ordinances § 19.83.050	Denies access to telecom in the ROW if residential
Fairfax Co.	VA	Fairfax County Code § 2232	DAS attachments require full hearing.

#### IV. Prohibitions on Certain Zoning Districts:

In their attempts to influence the scope and scale of wireless networks and infrastructure within their jurisdiction, local authorities are setting inappropriate and often illegal preferences on the types of wireless facilities that service providers can use and locating such facilities on municipal property. Jurisdictions that have codified blanket bans across certain zoning districts include:

<b>Jurisdiction</b>	<b>State</b>	<b>Citation</b>
Madison	AL	Zoning Ordinance § 17.5-8(k)
Maricopa Co.	AZ	N/A
Chatham Co.	GA	Zoning Ordinance § 1202
Savannah	GA	Zoning Ordinance § 8-3195 (b)
Waltham	MA	Zoning Ordinance § 10.5
Harford Co.	MD	Zoning Ordinance § 267-95(F)(1)
Battle Creek	MI	Zoning Ordinance § 1297.055
Bedford Twp.	MI	Zoning Ordinance § 400.1918(2)
Buncombe Co.	NC	Zoning Ordinance § 78-641(a)
Morrisville	NC	N/A
Wilmington	NC	Zoning Ordinance § 18-259
New Castle	NY	Zoning Ordinance § 60-437.9E6.
Franklin	OH	Zoning Ordinance § 1109(k)(8)
West Rockhill Twp.	PA	Zoning Ordinance, Art. 26 § 1604(F)(4)(3)(i)
Charleston	SC	Zoning Ordinance § 54.207(c)(g)
Forest Acres	SC	Zoning Ordinance § 21.245.7
Greenville	SC	Zoning Ordinance § 19-4.3.2 (F)(1)(b)
Isle of Palms	SC	Zoning Ordinance § 5-4-20(a)(6)
Richland Co.	SC	Zoning Ordinance § 59

## V. Problematic Consultants

Wireless consultants are the source of many of the barriers and prohibitive costs associated with the deployment of wireless facilities. It is common practice for these consultants to charge excessive application fees, impose superfluous application requirements (including proof of need), require discretionary review for collocations, and delay the application and review process. Jurisdictions that retain consultants identified by the wireless infrastructure industry as obstructionists and problematic include:

State	Jurisdiction
Alabama	Ardmore, City of
Alabama	Athens, City of
Alabama	Brundidge, Town of
Alabama	Camden, City of
Alabama	Decatur, City of
Alabama	Gulf Shores, City
Alabama	Hartselle, City of
Alabama	Hueytown, City of
Alabama	Killen, City of
Alabama	Madison, City
Alabama	Muscle Shoals, City
Alabama	Opelika, City
Alabama	Orange Beach
Alabama	Pelham, City of
Alabama	Rogersville, City of
Alabama	Sheffield
Alabama	Selma, City
Alabama	Talladega, City
Alabama	Trinity (Morgan County)
Alabama	Tuscumbia, City of
Alaska	Matanuska-Susitna, Borough of
Arizona	Apache County
Arizona	Paradise Valley, City of
Arizona	Scottsdale, City of
Arizona	Yavapai County
Arizona	Yuma City
California	Amador County

California	American Canyon, City of
California	Auburn, City of
California	Belvedere, City of
California	Benicia, City of
California	Calabasas, City of
California	Calistoga, City of
California	Clearlake, City of
California	Cloverdale, City of
California	Colfax, City of
California	Corte Madera, City of
California	Cotati, City of
California	Daly City, City of
California	Dana Point, City of
California	Davis, City of
California	Fairfax, City of
California	Fairfield, City of
California	Fort Bragg, City of
California	Glendale, City of
California	Goleta, City of
California	Grass Valley, City of
California	Half Moon Bay, City of
California	Healdsburg, City of
California	Lake County
California	Lake Forest, City of
California	Lakeport, City of
California	Lincoln, City of
California	Loomis, City of
California	Marin County
California	Mendocino County

California	Mill Valley, City of
California	Modesto, County of
California	Napa County
California	Napa, City of
California	Nevada County
California	Novato, City of
California	Oakley, City of
California	Orinda, City of
California	Pacifica, City of
California	Pasadena, City of
California	Petaluma, City of
California	Pinole, City of
California	Placer County
California	Placerville, City of
California	Point Arena, City of
California	Portola, City of
California	Rio Vista, City of
California	Rohnert Park, City of
California	Ross, City of
California	San Rafael, City of
California	Santa Monica, City of
California	Santa Rosa, City of
California	Sausalito, City of
California	Sebastopol, City of
California	Solano County
California	Sonoma County
California	Sonoma, City of
California	St. Helena, City of
California	Suisun, City of
California	Temecula, City of
California	Thousand Oaks, City of
California	Tiburon, City of
California	Ukiah, City of
California	Vacaville, City of
California	Vallejo, City of
California	Walnut Creek
California	Willits, City of
California	Windsor, City of

California	Yolo County
California	Yountville, City of
California	Yuba City, City of
Connecticut	Branford, Town of
Connecticut	Derby
Connecticut	Marlborough, Town of
Connecticut	Southbury, Town of
Florida	Alachua County
Florida	Alamonte Springs, City of
Florida	Cedar Grove, City of
Florida	Davie, Town of
Florida	DeFuniak Springs, City of
Florida	Ebro, Town of
Florida	Indian River County
Florida	Kissimmee, City of
Florida	Lakeland, City of
Florida	Liberty, County of
Florida	Margate, City of
Florida	Neptune Beach, Town of
Florida	Oconee, City of
Florida	Palm Coast, City of
Florida	Quincy, City of
Florida	West Palm Beach, City of
Georgia	Clayton County
Georgia	Coweta County
Georgia	Decatur County
Georgia	Dublin, Town of
Georgia	Gwinnett, County of
Georgia	Habersham County
Georgia	Laurens County
Georgia	Liberty County
Georgia	Pulaski County
Georgia	Sandy Spring
Georgia	Savannah, City of/Chatham County
Georgia	Troup County

Illinois	Collinsville, City of
Illinois	Oak Brook, Village of
Illinois	Peoria, City of
Illinois	Winnetka, Village of
Indiana	Aurora, City of
Indiana	Dearborn County
Indiana	Lawrenceburg, City of
Iowa	Lemars, City of
Iowa	Sioux Center, City of
Kansas	Harvey County
Kansas	Johnson County
Kansas	Overland Park, City of
Kansas	Sedgwick County
Kansas	Wichita, City of
Maine	Lincolnton
Maine	Manchester, Town of
Maine	North Berwick, Town of
Maryland	Augusta County
Maryland	Baltimore County
Maryland	Carroll County
Maryland	Montgomery County
Maryland	Prince George's County
Maryland	Walkersville, Town of
Massachusetts	Acton, Town of
Massachusetts	Agawam
Massachusetts	Aquinnah
Massachusetts	Ashburnham
Massachusetts	Ashland, Town of
Massachusetts	Auburn, Town of
Massachusetts	Ayer, Town of
Massachusetts	Barnstable, Town of
Massachusetts	Belmont, Town of
Massachusetts	Billerica, Town of
Massachusetts	Blandford
Massachusetts	Boston
Massachusetts	Bourne, Town of
Massachusetts	Boxborough
Massachusetts	Boxford

Massachusetts	Braintree
Massachusetts	Brewster, Town of
Massachusetts	Brookfield, Town of
Massachusetts	Burlington
Massachusetts	Canton, Town of
Massachusetts	Cape Cod Commission
Massachusetts	Carlisle
Massachusetts	Charlemont, Town of
Massachusetts	Chatham, Town of
Massachusetts	Chilmark
Massachusetts	Concord, Town of
Massachusetts	Conway
Massachusetts	Cummington, Town of
Massachusetts	Dalton
Massachusetts	Dartmouth, Town of
Massachusetts	Dedham
Massachusetts	Dennis, Town of
Massachusetts	Dennisport
Massachusetts	Dighton, Town of
Massachusetts	Dover
Massachusetts	Dracut
Massachusetts	Duxbury
Massachusetts	Eastham, Town of
Massachusetts	Edgartown, Town of
Massachusetts	Falmouth
Massachusetts	Fitchburg, Town of
Massachusetts	Framingham
Massachusetts	Georgetown, Town of
Massachusetts	Gloucester, City of
Massachusetts	Grafton, Town of
Massachusetts	Granby
Massachusetts	Great Barrington, Town of
Massachusetts	Groton, Town of
Massachusetts	Hamilton, Town of
Massachusetts	Harvard
Massachusetts	Harwich, Town of
Massachusetts	Harwichport

Massachusetts	Hingham
Massachusetts	Hubbardston
Massachusetts	Ipswich
Massachusetts	Kingston
Massachusetts	Lancaster
Massachusetts	Lanesborough
Massachusetts	Lee
Massachusetts	Lenox
Massachusetts	Leyden
Massachusetts	Lincoln, Town of
Massachusetts	Lynnfield
Massachusetts	Manchester by the Sea
Massachusetts	Marblehead
Massachusetts	Marlborough
Massachusetts	Marston Mills, Town of
Massachusetts	Mashpee, Town of
Massachusetts	Mashpee/Sandwich
Massachusetts	Maynard
Massachusetts	Medfield, Town of
Massachusetts	Medford, Town of
Massachusetts	Methuen
Massachusetts	Middlefield, Town of
Massachusetts	Millis
Massachusetts	Milton, Town of
Massachusetts	Montgomery, Town of
Massachusetts	Nahant
Massachusetts	Natick
Massachusetts	Newbury, Town of
Massachusetts	Newton
Massachusetts	Norton
Massachusetts	Oakham, Town of
Massachusetts	Orleans, Town of
Massachusetts	Osterville
Massachusetts	Pepperell
Massachusetts	Plymouth
Massachusetts	Princeton, Town of
Massachusetts	Provincetown, Town of

Massachusetts	Raynham
Massachusetts	Rowley, Town of
Massachusetts	Salisbury
Massachusetts	Sandwich
Massachusetts	Scituate, Town of
Massachusetts	Sharon, Town of
Massachusetts	Sheffield
Massachusetts	Shelburne
Massachusetts	Somerville, Town of
Massachusetts	Stockbridge, Town of
Massachusetts	Stoneham
Massachusetts	Stoughton
Massachusetts	Stow, Town of
Massachusetts	Sturbridge
Massachusetts	Sudbury
Massachusetts	Sutton
Massachusetts	Swansea
Massachusetts	Templeton, Town of
Massachusetts	Tewksbury
Massachusetts	Topsfield
Massachusetts	Truro, Town of
Massachusetts	Tyngsborough
Massachusetts	Wales, Town of
Massachusetts	Wareham
Massachusetts	Watertown
Massachusetts	Wayland
Massachusetts	Wellesley
Massachusetts	Wellfleet, Town of
Massachusetts	Wendell, Town of
Massachusetts	Wenham
Massachusetts	West Dennis
Massachusetts	West Newbury, Town of
Massachusetts	West Springfield, Town of
Massachusetts	West Stockbridge
Massachusetts	West Tisbury
Massachusetts	Westfield, Town of
Massachusetts	Westminster
Massachusetts	Weston, Town of

Massachusetts	Westport
Massachusetts	Westwood
Massachusetts	Wilbraham, Town of
Massachusetts	Woburn
Massachusetts	Worthington, Town of
Michigan	Detroit, City of
Michigan	Fenton
Michigan	Grosse Point Woods, City of
Michigan	Harbor Beach, City of
Michigan	La Salle
Michigan	Lyon Township
Michigan	Oceola Township
Michigan	Orchard Lake, City of
Michigan	Tyrone Township
Minnesota	Duluth, City of
Minnesota	Friedly, City of
Mississippi	Jefferson County
Missouri	Camden County
Missouri	Camden, City of
Missouri	Florissant, City of
Missouri	Lake of the Ozarks
Missouri	New Haven, City of
Missouri	Osage Beach, City of
Missouri	St. Charles, City of
Missouri	St. Clair, City of
Missouri	St. Clair County
Missouri	St. Peters, City of
Missouri	Washington, City of
Missouri	Wentzville, City of
Nebraska	Doniphan, Village of
Nebraska	Douglas County
Nebraska	Sarpy County
Nebraska	Saunders County
New Hampshire	Alton
New Hampshire	Ashland
New Hampshire	Belmont, Town of

New Hampshire	Bow
New Hampshire	Brookline
New Hampshire	Candia
New Hampshire	Carroll
New Hampshire	Chester
New Hampshire	Concord
New Hampshire	Conway, Town of
New Hampshire	Dublin, Town of
New Hampshire	Durham, Town of
New Hampshire	Effingham
New Hampshire	Goffstown
New Hampshire	Hillsborough, Town of
New Hampshire	Hollis
New Hampshire	Hudson, Town of
New Hampshire	Kingston, Town of
New Hampshire	Nashua
New Hampshire	Pembroke
New Hampshire	Tuftonboro
New Jersey	Paramus
New Mexico	Cibola County
New Mexico	Edgewood
New Mexico	Guadalupe
New Mexico	Lincoln County
New Mexico	Luna County
New Mexico	McKinley County
New Mexico	Mora County



New Mexico	Rio Rancho, City of
New Mexico	Roswell, City of
New Mexico	Ruidoso
New Mexico	Sandoval County
New Mexico	Sierra County
New Mexico	Socorro County
New York	Airmont, Town of
New York	Amherst, Town of
New York	Bayville Village
New York	Beekmantown
New York	Bethlehem
New York	Binghamton
New York	Brewster Village
New York	Bronxville, Village of
New York	Brutus, Town of
New York	Buchanan, Village of
New York	Caroline
New York	Chazy
New York	Cheektowaga, Town of
New York	Chester, Village of
New York	Colesville, Town of
New York	Colonie, Town of
New York	Conklin
New York	Cortlandt
New York	Danby
New York	Decatur
New York	Durham
New York	East Greenbush
New York	Fort Ann
New York	Fort Edward
New York	Ghent
New York	Goshen
New York	Hamlin
New York	Hamptonburgh
New York	Hastings, Town of
New York	Hastings-on-Hudson
New York	Haverstraw
New York	Hempstead, Town of
New York	Irvington Village

New York	Kirkwood, Town of
New York	Lawrence Village
New York	Maine
New York	Mamaroneck Village
New York	Milan
New York	Montgomery
New York	Mt. Vernon, City of
New York	Nanticoke
New York	New Rochelle City
New York	Newark Valley Town
New York	Newark Valley Village
New York	Newburgh
New York	North Tonawanda, Town of
New York	Olean
New York	Olive
New York	Oneonta, Town of
New York	Orangetown
New York	Ossining, Town of
New York	Ossining, Village of
New York	Oswego City
New York	Peekskill
New York	Pelham Village
New York	Petersborough
New York	Philadelphia
New York	Phillipstown, Town of
New York	Plattsburgh
New York	Putnam Valley, Town of
New York	Ramapo
New York	Richfield
New York	Rosendale
New York	Sheffield
New York	St. Johnsville
New York	Stanford, Town of
New York	Tarrytown
New York	Thompson
New York	Wayne County
New York	Wesley Hills

New York	Wheatland, Town of
New York	Woodbury
New York	Yonkers, City of
North Carolina	Cabarrus County
North Carolina	Carteret County
North Carolina	Catawba County
North Carolina	Chowan County
North Carolina	Clayton, Town of
North Carolina	Durham County
North Carolina	Franklin County
North Carolina	Franklin, Town of
North Carolina	Granville County
North Carolina	Harnett County
North Carolina	Haywood County
North Carolina	Jackson County
North Carolina	Johnston County
North Carolina	Lee County (including cities)
North Carolina	Lillington, Town of
North Carolina	Maiden, Town of
North Carolina	Moore County
North Carolina	Morrisville, City of
North Carolina	Nash County
North Carolina	Orange County (new builds only)
North Carolina	Pasquotank County

North Carolina	Perquimans County
North Carolina	Person County
North Carolina	Reidsville, City of
North Carolina	Roanoke Rapids
North Carolina	Rockingham, City of
North Carolina	Rolesville, Town of
North Carolina	Rowan County
North Carolina	Stokes County
North Carolina	Topsail Beach, Town of
North Carolina	Walnut Cove, Town of
North Carolina	Wendell
Ohio	Avon Lake, City of
Ohio	Glendae, Village of
Ohio	Monroe, City of
Ohio	Silverton, City of
Ohio	Streetsboro, City of
Ohio	Springdale, City of
Ohio	Waite Hill, Village of
Pennsylvania	Jefferson Township (Mercer County)
Pennsylvania	LeBeouf Township
Pennsylvania	Liberty Township (Adams County)
Pennsylvania	Lower Merion Township (Neighborhood group)
Pennsylvania	Mill Valley, City of
Rhode Island	Burrillville, Town of
Rhode Island	Coventry
Rhode Island	Cranston
Rhode Island	Exeter
Rhode Island	Foster

Rhode Island	Glocester, Town of
Rhode Island	Little Compton, Town of
Rhode Island	Smithfield
South Carolina	Oconee County
South Carolina	Saluda County
South Dakota	Custer County
South Dakota	Yankton County
Tennessee	Williamson County
Texas	Irving, City of
Texas	West University Place, City of
Virginia	Albermarle County
Virginia	Augusta County
Virginia	Bedford County
Virginia	Campbell County
Virginia	Caroline County
Virginia	Fauquier County
Virginia	Fluvanna County
Virginia	Hanover County
Virginia	Henrico County
Virginia	James County
Virginia	James, City of
Virginia	Loudoun County
Virginia	Lunenburg County
Virginia	Page County
Virginia	Roanoke County
Virginia	Rockbridge County
Virginia	Warren County

Virginia	Williamsburg, City of
Virginia	Wythville, Town of
Virginia	York County
Washington	Bothell, City of
Washington	King County
Washington	Lacey, City of
Washington	Medina, City of
Washington	Port Townsend, City of
Washington	Puyallup, City of
Washington	San Juan County
Washington	Shoreline, City of
West Virginia	Wheeling, City of
Wisconsin	Delafield, Town of
Wisconsin	Delvan, City of
Wisconsin	Genesee, Town of
Wisconsin	Kohler, Village of
Wisconsin	La Grange, Town of
Wisconsin	Mukwonago, Town of
Wisconsin	Oconomowoc Lake, Village of
Wisconsin	Oneida County
Wisconsin	Ottawa, Town of
Wisconsin	Portage County
Wisconsin	Richfield, Village of
Wisconsin	Scandinavia, Village of
Wisconsin	Vernon, Town of
Wisconsin	Waukesha County